

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

-----x
In re: PROMESA
THE FINANCIAL OVERSIGHT AND Title III
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of No. 17 BK 3283-LTS
THE COMMONWEALTH OF PUERTO RICO, *et al.* (Jointly Administered)
Debtors.¹
-----x

**URGENT UNOPPOSED MOTION SEEKING EXTENSION OF DEADLINE TO
FILE VERIFIED STATEMENT OF O'NEILL & BORGES LLC DISCLOSING
CONNECTIONS TO MATERIAL INTERESTED PARTIES PURSUANT TO
PUERTO RICO RECOVERY ACCURACY IN DISCLOSURE ACT**

To the Honorable United States District Court Judge Laura Taylor Swain:

O'Neill & Borges LLC ("O&B"), as Puerto Rico counsel for the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as representative of the Commonwealth of Puerto Rico ("Commonwealth"), the Puerto Rico Sales Tax Financing Corporation ("COFINA"), the Puerto Rico Highways and Transportation Authority ("HTA"), the Employees Retirement System for the Commonwealth of Puerto Rico ("ERS"), the Puerto Rico Electric Power Authority ("PREPA") and the Puerto Rico Public Buildings Authority jointly

¹ The Debtors in the jointly-administered Title III Cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

(“PBA,” with the Commonwealth, COFINA, HTA, ERS and PREPA referred to as “Debtors”), as Title III debtors, by and through the Oversight Board, as the Debtors’ representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² respectfully submit this motion (the “Motion”), for entry of an order, substantially in the form attached hereto as Exhibit A, extending the deadline for O&B to file its verified statement pursuant to the *Order Approving List of Material Interested Parties Pursuant to The Puerto Rico Recovery Accuracy In Disclosures Act* [ECF No. 20467] (“Order”) and the *Puerto Rico Recovery Accuracy in Disclosures Act*, Pub. L. No. 117-82 (“PRRADA”). In support of this Motion, O&B respectfully represents as follows:

Relief Requested

1. By this Motion, O&B requests an order extending the deadline to file its final verified statement, pursuant to PRRADA, until June 30, 2022.
2. On February 22, 2022, the Oversight Board filed the *Motion of Financial Oversight and Management Board for Puerto Rico Requesting Order Approving Proposed List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act* [ECF No. 20194] (the “PRRADA Motion”), seeking Court approval of a list of material interested parties attached thereto as Exhibit A (the “Initial MIP List”) pursuant to PRRADA.
3. On March 21, 2022, the Court entered its *Order Regarding Proposed List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosure Act* [ECF No. 20419], directing the Oversight Board to file an amended MIP List.
4. On March 29, 2020, the Oversight Board filed the *Notice of Filing Amended List of Material Interested Parties Pursuant to Puerto Rico Recovery Accuracy in Disclosures Act* [ECF

² PROMESA has been codified in 48 U.S.C. §§ 2101–2241.

No. 20458], which attached a list of material interested parties with respect to all Title III Debtors as Exhibit A thereto (the “Amended MIP List”). The Amended MIP List broke out the material interested parties in separate schedules for each of the Title III Debtors.

5. On March 30, 2022, the Court entered the Order, which approved the Amended MIP List and directed all professionals to file the disclosures required under PRRADA by May 16, 2022.

6. O&B is in the process of drafting its verified statement pursuant to PRRADA. In order to finalize and file the verified statement, O&B will require forty-five (45) days, that is, until June 30, 2022. Accordingly, O&B requests an extension of forty-five (45) days to submit its verified statement.

7. O&B obtained the consent of the U.S. Trustee for this extension of time.

8. O&B hereby certifies that there is a true need for urgent relief and that such urgency was not created through any lack of due diligence.

9. No prior request for the relief sought in this Motion has been made to this or any other court.

[Remainder of Page Intentionally Left Blank]

WHEREFORE O&B respectfully requests the Court to enter the Proposed Order attached hereto as Exhibit A, granting the relief requested herein and all other relief that is just and proper.

Dated: May 12, 2022
San Juan, Puerto Rico

Respectfully submitted,

/s/ Carla García Benítez
Carla García Benítez
USDC-PR No. 203708

O'NEILL & BORGES LLC
250 Muñoz Rivera Ave., Suite 800
San Juan, PR 00918-1813
Tel: (787) 764-8181
Fax: (787) 753-8944

*Attorneys for the Financial
Oversight and Management Board
as Representative for the Debtors*

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

-----x
In re: PROMESA
THE FINANCIAL OVERSIGHT AND Title III
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of No. 17 BK 3283-LTS
THE COMMONWEALTH OF PUERTO RICO, *et al.* (Jointly Administered)
Debtors.¹
-----x

**ORDER EXTENDING DEADLINE TO
FILE VERIFIED STATEMENT PURSUANT TO
PUERTO RICO RECOVERY ACCURACY IN DISCLOSURE ACT**

Upon the *Urgent Unopposed Motion Seeking Extension of Deadline to File Verified Statement of O'Neill & Borges LLC Disclosing Connections to Material Interested Parties Pursuant to Puerto Rico Recovery Accuracy in Disclosure Act* (the “Motion”);² and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306(a); and it appearing that venue is proper pursuant to PROMESA section 307(a); and

¹ The Debtors in the jointly-administered Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Motion.

the Court having found that the relief requested in the Motion is in the best interests of the Debtors, their creditors, and other parties in interest, it is **HEREBY ORDERED THAT:**

1. The Motion is granted as set forth herein.
2. The deadline for O'Neill & Borges LLC to file its verified statement pursuant to the *Order Approving List of Material Interested Parties Pursuant to The Puerto Rico Recovery Accuracy in Disclosures Act* [ECF No. 20467] and the *Puerto Rico Recovery Accuracy in Disclosures Act*, Pub. L. No. 117-82, shall be extended to **June 30, 2022**.
3. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.
4. This Order resolves docket entry no. _____.

SO ORDERED.

Dated: _____, 2022
San Juan, Puerto Rico

LAURA TAYLOR SWAIN
United States District Judge